

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

JOSE ENRIQUE SANTANA RAMOS

DEBTOR

CASE NO 17-07343 MCF

CHAPTER 13

**DEBTOR'S REPLY TO TRUSTEE'S MOTION TO DISMISS
DOCKET NO. 29**

TO THE HONORABLE COURT:

COMES NOW, JOSE ENRIQUE SANTANA RAMOS, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. The Chapter 13 Trustee filed a *Trustee's Motion to Dismiss*, Docket No. 29, basically stating that the Debtor had failed to file a Chapter 13 Plan; file amended Schedules "I" and "J"; file Chapter 13 means test; file attorney statement of compensation; commence making Plan payments and submit documents required under Section 521(a) to the Chapter 13 Trustee, in the above captioned case.

2. The Debtor hereby replies to the Trustee's motion stating that on this same date May 29, 2018, the Debtor filed a proposed *Chapter 13 Plan* (Docket No. 36); filed Amended Schedules I & J (Docket No. 35); filed the Chapter 13 Statement of Income/Forms 122-C1 and 122C-2 (Docket No. 34) and also filed *the Attorney Disclosure of Compensation 2016(b)* (Docket No. 33).

3. Furthermore, the Debtor is submitting to the Chapter 13 Trustee the required documents under Section 521(a) and the Debtor will make the 1st payment to the proposed Plan on or before May 30, 2018, in order to cure the objections raised by the Trustee in his motion for dismissal, Docket No. 29, in the present Chapter 13 case.

WHEREFORE, the Debtor respectfully prays that this Honorable Court grant the Debtor's present reply and deny the Chapter 13 Trustee's motion requesting dismissal, Docket No. 29, in the above captioned case.

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I HEREBY CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee and to all other CM/ECF participants; and also certify that I have mailed by United States Postal Service copy of this motion to the following non-participant: the Debtor, Jose Enrique Santana Ramos, HC 33 Box 3389 Dorado PR 00646, in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 29th day of May, 2018.

/s/ Roberto Figueroa Carrasquillo
USDC #203614
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
ATTORNEY FOR DEBTOR
PO BOX 186 CAGUAS PR 00726-0816
TEL 787-744-7699 FAX 787-746-5294
EMAIL: rfigueroa@rfclawpr.com